

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

JACLYN KRATZER and ACCESS	)	
NOW, INC., a Florida not for profit	)	
corporation,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 03 CV 4155
	)	
	)	
CARROLS CORPORATION, a Delaware	)	
Corporation,	)	
	)	
Defendant.	)	

**ORDER**

AND NOW THIS                      day of                      , 2004, upon consideration of the unopposed Motion for Admission *Pro Hac Vice* of Helen N. Baker, Esquire and Jeffrey J. Mayer, Esquire, it is hereby ordered that the motion is GRANTED and that Helen N. Baker and Jeffrey J. Mayer are admitted to the Bar of this Court for the purposes of this case only. It is further ORDERED that Paul J. Greco and Kelly G. Huller of the law firm Conrad O'Brien Gellman & Rohn, P.C., shall act as Associate Counsel for Ms. Baker and Mr. Mayer pursuant to Local R. Civ. P. 83.5.2.

BY THE COURT:

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Hon. Michael M. Baylson

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

JACLYN KRATZER and ACCESS  
NOW, INC., a Florida not for profit  
corporation,

Plaintiffs,

v.

CARROLS CORPORATION, a Delaware  
Corporation,

Defendant.

Case No. 03 CV 4155

**MOTION FOR THE ADMISSION *PRO HAC VICE* OF  
HELEN N. BAKER, ESQUIRE AND JEFFREY J. MAYER, ESQUIRE**

The undersigned attorneys for defendant Carrols Corporation, members of the Bar of this Court, hereby move for the admission *pro hac vice* of Helen N. Baker, Esquire, and Jeffrey J. Mayer, Esquire. They aver in support thereof as follows:

1. Ms. Williams and Mr. Mayer are attorneys in the law firm of Freeborn & Peters LLP, 311 South Wacker Drive, Suite 3000, Chicago, IL 60606-6677.
2. Ms. Williams and Mr. Mayer offer the accompanying affidavits in support of this motion.
3. The undersigned will serve as "Associate Counsel" for Ms. Williams and Mr. Mayer pursuant to Local R. Civ. P. 83.5.2.
4. The undersigned has consulted counsel for plaintiff, and the motion is unopposed.

WHEREFORE, the undersigned respectfully request that this Court grant the motion, admit Ms. Williams and Mr. Mayer *pro hac vice* to the Bar of this Court, and enter an order in the form attached hereto.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Paul J. Greco". The signature is fluid and cursive, with the first name "Paul" being more prominent.

Paul J. Greco (ID No. 55770) (PG634)  
Kelly G. Huller (ID No. 78966) (KH718)  
Conrad O'Brien Gellman & Rohn, P.C.  
1515 Market Street – Suite 1600  
Philadelphia, PA 19102-1916  
Phone: 215-864-8063/8083  
Fax: 215-864-9620

Dated: January 20, 2004

Attorneys for Defendant  
Carrols Corporation

# Exhibit A

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

JACLYN KRATZER and ACCESS )  
NOW, INC., a Florida not for profit )  
corporation, )

Plaintiffs, )

v. )

Case No. 03 CV 4155

CARROLS CORPORATION, a Delaware )  
Corporation, )

Defendant. )

**AFFIDAVIT OF HELEN N. BAKER**

I, Helen N. Baker, being duly sworn according to law, depose and say as follows:

1. I am a member in good standing of the bars of the States of Indiana and Illinois, the United States District Courts for the Northern District of Illinois, the Northern District of Indiana, and the Southern District of Indiana, and the United States Court of Appeals for the Seventh Circuit.

2. I was first admitted to the practice of law in the State of Indiana in 1990.

3. I am presently employed as an attorney with the law firm of Freeborn & Peters LLP.

4. I have a professional relationship with defendant Carrols Corporation, and both I and other members of my firm have represented the company in a number of matters.

5. I am fully familiar with the above-captioned matter and have been requested by Carrols Corporation to represent it in connection with this action.

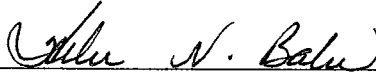
6. There are no disciplinary actions pending against me in any jurisdiction, and no discipline has previously been imposed upon me in any jurisdiction.

7. I agree to familiarize myself with the Rules governing the United States District Court for the Eastern District of Pennsylvania and to comply fully and be bound by the requirements thereof.


8. I understand that if I am admitted *pro hac vice*, I will be subject to the discipline of this Court for any misconduct.

9. I therefore request, on behalf of defendant Carrols Corporation, that I be admitted *pro hac vice* for the purposes of representing it in this matter in association with the Pennsylvania law firm of Conrad O'Brien Gellman & Rohn, P.C.

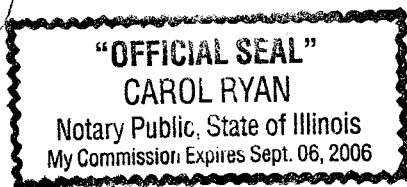
10. I have read the foregoing statements, and they are true, correct, and based upon my own personal knowledge.

  
\_\_\_\_\_  
Helen N. Baker

SUBSCRIBED AND SWORN  
TO BEFORE ME THIS 16<sup>th</sup>  
DAY OF JANUARY, 2004

  
\_\_\_\_\_  
NOTARY PUBLIC

588330



# Exhibit B

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

JACLYN KRATZER and ACCESS )  
NOW, INC., a Florida not for profit )  
corporation, )

Plaintiffs, )

v. )

Case No. 03 CV 4155

CARROLS CORPORATION, a Delaware )  
Corporation, )

Defendant. )

**AFFIDAVIT OF JEFFREY J. MAYER**

I, Jeffrey J. Mayer, being duly sworn according to law, depose and say as follows:

1. I am a member in good standing of the bars of the States of Illinois, Ohio, and Michigan, the United States District Court, Northern District of Illinois (1987), the United States District Court, Eastern District of Michigan (1992), the United States District Court, Colorado (1999), the Central District Court of Illinois (2002), the United States Court of Appeals for the Sixth and Seventh Circuits (1993), the United States Court of Appeals for the Eighth Circuit (2000), the United States Supreme Court (1995), the United States District Court, Western District of Michigan (2003), and the United States District Court, Northern District of New York (2003)

2. I was first admitted to the practice of law in the State of Illinois in 1986.

3. I am presently employed as an attorney with the law firm of Freeborn & Peters LLP.

4. I have a professional relationship with defendant Carrols Corporation, and both I and other members of my firm have represented the company in a number of matters for nearly ten years.



5. I am fully familiar with the above-captioned matter and have been requested by Carrols Corporation to represent it in connection with this action.

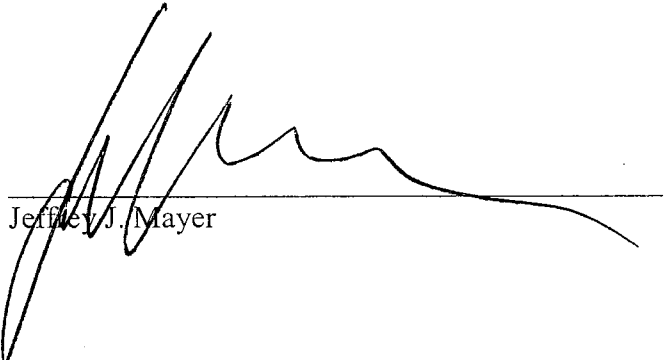
6. There are no disciplinary actions pending against me in any jurisdiction, and no discipline has previously been imposed upon me in any jurisdiction.

7. I agree to familiarize myself with the Rules governing the United States District Court for the Eastern District of Pennsylvania and to comply fully and be bound by the requirements thereof.

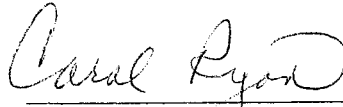
8. I understand that if I am admitted *pro hac vice*, I will be subject to the discipline of this Court for any misconduct.

9. I therefore request, on behalf of defendant Carrols Corporation, that I be admitted *pro hac vice* for the purposes of representing it in this matter in association with the Pennsylvania law firm of Conrad O'Brien Gellman & Rohn, P.C.

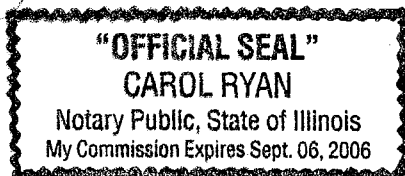
10. I have read the foregoing statements, and they are true, correct, and based upon my own personal knowledge.

  
Jeffrey J. Mayer

SUBSCRIBED AND SWORN  
TO BEFORE ME THIS 16<sup>th</sup>  
DAY OF JANUARY, 2004

  
NOTARY PUBLIC

588364



**CERTIFICATE OF SERVICE**

I, Paul J. Greco, hereby certify that I caused a true and correct copy of the foregoing Proposed Order and Motion for the Admission *Pro Hac Vice* of Helen N. Baker, Esquire and Jeffrey J. Mayer, Esquire to be served by first-class U.S. Mail, proper postage pre-paid, to the below-listed parties:

Michael A. Green, Esq.  
Law Offices of Michael A. Green  
1819 John F. Kennedy Blvd.  
Suite 400  
Philadelphia, PA 19103

Joel Zuckerman  
Schwartz Sweben & Associates, LLP  
103 N. Adams Street  
Rockville, MD 20852



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Paul J. Greco

Dated: January 20, 2004